

TO: Roger Hinkle, Chief Licensing Authority Branch
Warehouse and Inventory Division
Farm Service Agency
U. S. Department of Agriculture
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FROM: R. Ford Lanterman
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SUBJECT: Proposed rule on Implementation of the United States Warehouse Act

As a retired USDA employee, I submit the following comments on the Proposed Rule.

Page 46312 The applicability of New York State law in resolving disputes may be a departure from the common rule of law.

Page 46312 List of Subjects in 7 CFR Part 735. The word Warehouses appears to be out of place when used after Tobacco.

Page 46313 735.1 If the intent is to license warehouse operators and approve providers, then the language needs to be more specific.

Page 46313 735.2 (b) The phrase programs requirements seems out of place in licensing regulation.

Page 46315 735.10 (a) Delete the word approved from the phrase approved licensee.

Page 46315 735.14 (e) This section reinforces my comment on the applicability of New York State law in the Background section.

Page 46319 Licensing Agreement for Cotton - I The Net Worth section should be moved up to follow Current liabilities.

Page 46328 Licensing Agreement for Grain - I The Net Worth section should be moved up to follow Current liabilities.

Page 46336 Fee table for Grain - Note the word bales in the CCC Agreement column at the bottom of the page.

I can appreciate all of the effort and time from those involved in this undertaking.

R. Ford Lanterman